



WorbyGronerEdelman  
& NapoliBern LLP  
ATTORNEYS AT LAW

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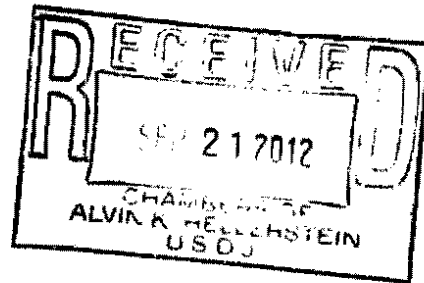
*Plaintiffs may take the dep'n  
of Tammy Veikos, but a witness  
and not a "30(b)(6)" designee.  
9.21.12*

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September 20, 2012

VIA ELECTRONIC MAIL AND HAND DELIVERY

Hon. Alvin K. Hellerstein, U.S.D.J.  
United States District Court for the  
Southern District of New York  
500 Pearl Street, Rm. 1050  
New York, NY 10007



Re: *In Re: World Trade Center Lower Manhattan Disaster Site Litigation*  
21 MC 102 (AKH)

Dear Judge Hellerstein:

The Plaintiffs represented by Worby Groner Edelman & Napoli Bern, LLP ("Plaintiffs") and Defendant The Related Companies, LP ("The Related Companies") submit this joint letter regarding a discovery dispute. Plaintiffs and Defendant "met and conferred" about this unresolved discovery issue on August 31, 2012. However, to date, Plaintiffs have not been able to resolve this discovery dispute with The Related Companies.

***Plaintiffs' Position:***

On Friday, June 15, 2012, Plaintiffs conducted a deposition pursuant to Fed. R. Civ. P. 30(b)(6) of the Related Companies. The Related Companies produced Peter Hoyle, the current Vice President of Engineering and former Director of Engineering. Throughout his testimony, Mr. Hoyle referenced Tammy Veikos<sup>1</sup>, the current Senior Vice President and former Regional Manager of The Related Companies, as a person who has specific knowledge about many of topics in the Plaintiffs' deposition notice involving the debris removal and cleanup efforts at 225 Rector Place.

<sup>1</sup> This witness's last name was incorrectly spelled in the deposition transcript as "Vagos".